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My comments are confined to the gamebird aspect of the CVM's discussion draft. The document clearly expressed the dilemma commercial gamebird raisers have found themselves since AMDUCA was passed. With the fact that there are only a handful of currently approved gamebird feed medications, the assertion that parasite resistance is of concern cannot be overstated. Commercial gamebird operations need access to feed medications for their gamebird farms to remain profitable.

The North American Gamebird Association (NAGA) has begun actively pursuing feed medication approvals working with the NRSP-7 project. Currently NRSP-7 has 12 NAGA feed medication applications on file. So in response to section "C"'s question - should NRSP-7 funding be expanded - YES!

But the NRSP-7 project is a longer range solution to the current feed medication problem. As the CVM draft acknowledges - the gamebird people need a short-term answer - and they need it soon.

The CVM draft suggest a 10 year sunset clause that would allow gamebird producers to feed their gamebirds feed medicated with drugs already approved for chickens or turkeys. At first glance this 10 year sunset clause appears to be terrific. And in response to the draft's question if a 10 year sunset would be a dis-incentive to further pursuit of approvals - no it would not because I assert that the NAGA would not let that happen.

The 10 year sunset clause would require legislation. Who would propose this legislation? And more importantly, once a sponsor for the 10 year sunset clause was found - the feed industry (represented by AFIA) would oppose the legislation. The AFIA has been on record adamantly opposing extra-label feed medication.

Since the gamebird farmers need to have a short-term solution to allow them to medicate their gamebirds through the feed - cooperation in proposing legislative change is imperative. Since feed manufacturers will be producing the medicated feed - the CVM and the gamebird producers need to work closely with the feed manufacturers so that the proposed legislative fix can be passed quickly by Congress.

So in summary - we need everyone to agree in advance before legislation is proposed in Congress. If the gamebird producers can get the AFIA to agree to a ten year sunset clause allowing chicken or turkey medications to be fed in the feed to gamebirds - great. If not, hopefully the CVM, the gamebird producers and the AFIA can come to another solution soon.

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97N-0217

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